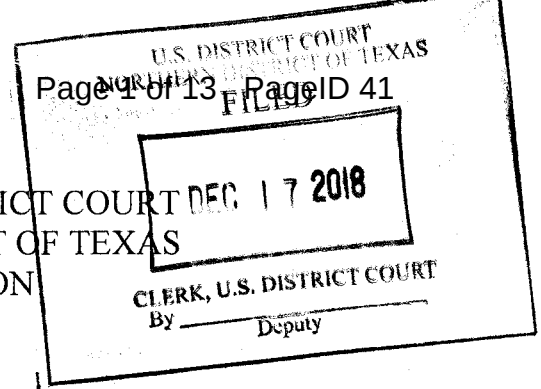


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:18-MJ- 781

FAIZAL SABAR (01)
a/k/a "Brian Pimentel"
JOSHUA GLAZE (02)
KIRALEE MCKNEELY (03)

CRIMINAL COMPLAINT

I, Special Agent Michael Pederson, the undersigned Complainant, being duly sworn, set forth facts and reasonable inferences from those facts, establishing that there is probable cause to believe that:

Beginning on or about November 18, 2016, and continuing through on or about February 1, 2018, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendants, **Faizal Sabar** (also known as Brian Pimental), **Joshua Glaze**, and **Kiralee McKneely**, along with others known and unknown, conspired and agreed with each other to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained the following individuals, as well as others, AV1 and AV2, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion, and any combination of such means would be used to cause AV1 and AV2 to engage in commercial sex acts, in violation of 18 U.S.C. §§ 1591(a)(1) and (a)(2) and (b)(1).

In violation of 18 U.S.C. § 1594(c) (18 U.S.C. §§ 1591(a)(1) and (a)(2) and (b)(1)).

PROBABLE CAUSE

I am a Special Agent with the Department of Homeland Security (DHS) - Homeland Security Investigations (HSI) assigned to the Office of the Special Agent-in-Charge, Dallas, Texas. This complaint is based on the following facts gathered through my investigation conducted in coordination with the Northlake Police Department Criminal Investigations Division. I state the following is true and correct to the best of my knowledge and belief:

1. On February 28, 2018, I met with Detective Williams of the Northlake Police Department Criminal Investigation Division in reference to a suspected Human (Sex) Trafficking Organization operating in the Fort Worth and Northlake, Texas areas. Through the course of this investigation, I have identified **SABAR, GLAZE**, and **MCKNEELY** as members of this Sex Trafficking Organization who have recruited, advertised, sold or purchased several women for the purpose of commercial sex, commonly referred to as "prostitution."

2. Through the investigation, I have determined that **SABAR, GLAZE**, and **MCKNEELY** through the use of physical force, fraud and coercion facilitated, obtained or assisted in the facilitation of commercial sex acts performed by an adult female identified in this complaint as Adult Victim 1 (AV1).

3. Through the investigation, I have determined that **SABAR, GLAZE**, and **MCKNEELY** through the use of physical force, fraud and coercion facilitated, obtained

or assisted in the facilitation of commercial sex acts performed by an adult female identified in this complaint as Adult Victim 2 (AV2).

4. Through the investigation, I have determined that **SABAR, GLAZE and MCKNEELY** frequently worked together as an organization by utilizing some of the same adult female victims to engage in commercial sex acts, operating out of the same hotels while engaging in a commercial sex enterprise, transporting female victims for the purpose of commercial sex acts, utilizing and sharing cellphones that were used to post advertisements for adult (female victims) for commercial sex on Backpage.com, taking photographs of (adult) female victims either nude or in their underwear that were used in Backpage.com advertisements for commercial sex and obtaining hotel rooms that were used to engage in commercial sex activities.

5. Through the investigation, I have also determined that **SABAR, GLAZE and MCKNEELY** would also assist each other in collecting the proceeds that were earned through commercial sex acts.

6. Through the investigation, I have further determined that several unidentified female victims also engaged in commercial sex acts at the direction of **SABAR, GLAZE and MCKNEELY**.

7. In March of 2018, Homeland Security Investigations Special Agent John Kochan interviewed Adult Victim 1 (AV1) at her residence. AV1 stated that she had engaged in commercial sex acts at the direction of an individual known to AV1 as "Brian Pimentel" during the time frame of November 2016 up until early February 2018 in

numerous cities located within the state of Texas to include Fort Worth, Waco, Northlake and Lewisville. AV1 stated that she has also engaged in commercial sex acts at the direction of Brian Pimentel in the state of Oklahoma. I have identified the individual known to AV1 as "Brian Pimentel" as **SABAR**. AV1 stated that **SABAR** was her pimp, but that **SABAR** was frequently assisted by other members of the organization known to AV1 as "Josh" and "Kira", I have identified "Josh" as **GLAZE** and "Kira" as **MCKNEELY**.

8. Through my training and experience, I know that the term "pimp" is used to identify the person controlling the commercial sex activities of the individual engaging in commercial sex acts. I further know that pimps receive the proceeds that are earned through commercial sex, provide the means of engaging in commercial sex acts (i.e. Condoms, Lingerie, Hotel Rooms, Cellphones, etc.) and that pimps will frequently utilize threats, violence, sexual assault, intimidation and other violent or punishing methods to control the people engaging in commercial sex acts at his/her direction.

9. AV1 stated that during the time period in which AV1 engaged in commercial sex acts at the direction of **SABAR**, **GLAZE** assisted **SABAR** by instructing **SABAR** on how to be a pimp as well as by renting hotel rooms that were used for the purpose of commercial sex, creating Backpage.com accounts that were used to post ads for commercial sex, posting ads for commercial sex (featuring AV1 and AV2) on Backpage.com and collecting the proceeds that AV1 and AV2 earned by engaging in commercial sex acts.

10. AV1 stated that during the time period in which she engaged in commercial sex acts at the direction of **SABAR**, **MCKNEELY** assisted **SABAR** by instructing AV1 in the performance of commercial sex acts, posting of ads for commercial sex acts (for both AV1 and AV2) on Backpage.com, communicating with commercial sex clients (johns) to arrange dates for commercial sex acts and by collecting the proceeds that AV1 earned by engaging in commercial sex acts.

11. AV1 stated that in December 2017 she engaged in commercial sex acts with K.M. and K.M. gave **SABAR** two (2) handguns as payment for the commercial sex act. Both handguns were later recovered from **SABAR**'s possession by the Northlake Police Department as referenced later in this affidavit.

12. On March 2, 2018 Special Agent (SA) Kochan and I interviewed K.M. at his residence in Fort Worth, Texas. K.M. admitted to contacting AV1 in the middle of December 2017 through a Backpage.com ad for commercial sex and giving AV1 two handguns only minutes prior to engaging in sexual intercourse with AV1, but denied that the handguns were a payment for sex. During the interview K.M. further stated that he had sold three (3) additional handguns to **SABAR** at later dates. A criminal history check of **SABAR** indicated that **SABAR** was a convicted felon at the time K.M. traded the two (2) handguns as payment for commercial sex and at the time K.M. sold **SABAR** the three (3) additional handguns.

13. I have observed and documented numerous text messages between K.M. and **SABAR** that were contained on a cellphone that was seized from **SABAR** at the time

he was arrested by the US Marshal Service in Fort Worth, Texas. I have observed that these text messages clearly show that K.M. was trading the firearms to **SABAR** as payment for commercial sex acts that were performed by AV1, and that K.M. was aware of the fact that **SABAR** was AV1's pimp. I further observed several text messages that indicate K.M. continued to engage in commercial sex acts with AV1 on several later dates and that K.M. continued to offer firearms (both handguns and semiautomatic rifles) as payment for these commercial sex acts. During the interview, K.M. stated that he had engaged in sexual intercourse with AV1 on numerous occasions at various hotels located in the Fort Worth and Northlake, Texas areas as well as an apartment located in Fort Worth, Texas that was occupied by AV1 and **SABAR**. K.M. further stated that **SABAR** would frequently be present when K.M. met AV1 but would leave the hotel room/apartment while K.M. engaged in commercial sex acts with AV1.

14. Through my training and experience, I know that Backpage.com is a commercial website that is frequently used to advertise commercial sex acts.

15. SA Kochan interviewed AV1 who stated that **SABAR, GLAZE and MCKNEELY** posted ads for commercial sex on Backpage.com utilizing accounts that were created by **GLAZE** and **MCKNEELY**. SA Kochan observed and documented numerous ads for commercial sex featuring photos of a white female that he immediately recognized as AV1 as well as numerous Backpage.com ads featuring photos of another white female that he immediately recognized as AV2 that were posted on Backpage.com during the time period addressed in this Criminal Complaint under the account

kellybanks5959@gmail.com which has been identified as belonging to **MCKNEELY** and **GLAZE**. I have also observed that the recovery email address for the Gmail account kellybanks5959@gmail.com is jglaze214@gmail.com which is also the email address used to create a Facebook.com account identified as belonging to **GLAZE**.

16. Through the course of this investigation I have obtained and documented numerous Backpage.com ads for commercial sex containing photographs of a white female that I immediately recognized as AV2. I have observed that the phone number utilized in several of these Backpage.com ads is the same phone number that is tied to the Facebook.com account identified as belonging to **SABAR**. I have identified AV2 as an adult female who resides in the Fort Worth, Texas area.

17. During her interview, AV1 stated that **SABAR** would frequently assault her if she did not make enough money through commercial sex acts or if she angered him in any way. AV1 described the assaults as physical beatings that frequently resulted in bruising or bleeding and stated that during one such beating **SABAR** punched AV1 so hard in the temple that he told AV1 that he was shocked that AV1 was still conscious. AV1 stated that these beatings occurred over the entire time period that AV1 was engaging in commercial sex acts at the direction of **SABAR**. AV1 also stated that **SABAR** would frequently rape AV1 by forcing her to engage in vaginal sexual intercourse against AV1's wishes.

18. AV1 stated that during the time period she was engaging in commercial sex acts at the direction of **SABAR**, **SABAR** would set a quota on the amount of money that AV1 had to earn by engaging in commercial sex acts before AV1 would be allowed to sleep or eat. AV1 stated that not meeting the quota set by **SABAR** usually resulted in **SABAR** physically assaulting her.

19. I have reviewed an interview of witness J.H. that was conducted by Detective Williams. I observed that witness J.H. stated that he had observed AV1 on numerous occasions during the time period AV1 was engaging in commercial sex acts at the direction of **SABAR**. I observed that witness J.H. stated that on many of those occasions he observed that AV1 had bruises and injuries such as a busted lip that AV1 told him were inflicted by **SABAR**.

20. Detective Williams and I interviewed Witness M.S. and he advised that he met AV1 and developed a friendship over the course over several months. M.S. gave AV1 money on multiple occasions to help her out. M.S. also admitted to having sexual intercourse with AV1 on one occasion. However, M.S. denied that money was ever provided to AV1 in exchange for sex. M.S. reported that he went to AV1's apartment on multiple occasions to hang out. He described the apartment as a loft-style apartment, not having much furniture, which is consistent with the description provided by K.M. During the interview, M.S. reported that on one occasion last year, he was contacted by AV1 via phone and told that **SABAR** was actively assaulting her. **SABAR** then got on the phone

with M.S. and told M.S. that AV1 was his property and that if M.S. wanted to see AV1, he would have to pay for it.

21. AV1 stated that she engaged in commercial sex acts at the direction of **SABAR** at numerous hotels located in the Fort Worth and Northlake, Texas areas as well as at the Winstar Hotel in Thackerville, Oklahoma. I have obtained receipts from several of the hotels AV1 identified as the hotels in which she engaged in commercial sex acts at the direction of **SABAR** for rooms that were rented in the names of **GLAZE**, **MCNEELY**, and Brian Pimentel (aka **SABAR**) that correspond to dates and locations that I have observed in the Backpage.com ads for commercial sex featuring photos of AV1 and AV2.

22. I observed a Backpage.com ad for commercial sex (Posting ID74593042) that contains photographs of a white female that I immediately recognized as AV1. I observed that Posting ID74593042 was posted on January 4, 2018 and states that AV1 was in Fort Worth, Texas. I have obtained a receipt from the LaQuinta Hotel located at 4900 Bryant Irvin Road Fort Worth, Texas 76132 which also corresponds to a date and location in which AV1 stated she engaged in commercial sex acts at the direction of **SABAR**.

23. I observed a Backpage.com ad for commercial sex (Posting ID expired) that contained photographs of a white female that I immediately recognized as AV2. I observed that this ad was posted on December 1, 2017 and provided a location of Texoma/Winstar which corresponds to a date and location in which AV1 stated that she engaged in commercial sex acts at the direction of **SABAR** and **GLAZE**.

24. I observed Backpage.com ad for commercial sex (Posting ID76727727) that contained photographs of a white female that I immediately recognized as AV1. I further observed that Posting ID76727727 was posted on February 1, 2018 with a location of Fort Worth, Texas and that the photographs contained in Posting ID76727727 are the same photographs that I observed on a cellphone identified as belonging to **SABAR**.

25. On December 15, 2018 Northlake Police Department Detective D. Williams responded to the Home 2 Suites located at 13351 Raceway Drive, Northlake, Texas 76262 in reference to a complaint from management about patrons possibly engaging in prostitution within the Home 2 Suites establishment. Upon arrival, Detective Williams interviewed AV1 who stated that she was staying in Room 324 within the Home 2 Suites along with **SABAR**. AV1 further stated that AV2 was staying at the hotel as well in a separate room (Room 322). When Detective Williams confronted AV1 about the suspected prostitution, AV1 stated that AV2 had ads (for commercial sex) on Backpage.com and that AV2 "fucks for money". Detective Williams later attempted to interview AV2, but AV2 refused to speak with investigators.

26. Through the course of this investigation I have observed that AV2 is an adult female who was engaging in commercial sex acts at the direction of both **SABAR** and **GLAZE**. Through the use of agency subpoena I have obtained records from Backpage.com that included numerous ads for commercial sex featuring photographs of a white adult female that I immediately recognized as AV2. I have further observed that the

ads for commercial sex were placed under the Backpage.com accounts that were utilized by **GLAZE** and **MCKNEELY**.

27. After AV2 refused to speak with investigators, Detective Williams again made contact with AV1 who was now accompanied by **SABAR** in Room 324. Both AV1 and **SABAR** consented to a search of Room 324 which resulted in Detective Williams recovering two firearms.

28. Detective Williams first asked AV1 about the handguns that had been located inside of Room 324. AV1 stated that K.M. had traded both handguns as payment for commercial sex acts with AV2.

29. Detective Williams next asked **SABAR** about the handguns that had been located inside of Room 324. **SABAR** stated that both handguns belonged to AV2. **SABAR** further stated that K.M. had traded the guns as payment for commercial sex acts with AV2.

30. Detective Williams obtained room receipts for Room 322 and 324 that showed both rooms had been rented by **GLAZE**.

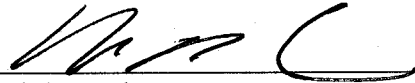
31. Detective Williams also obtained a copy of a Backpage.com ad for commercial sex that had been printed by the manager of the Home 2 Suites. Detective Williams observed that the Backpage.com ad contained photographs of a white female that Detective Williams immediately recognized as AV2. I have observed the same Backpage.com ad in a return for information requested via subpoena relating to Backpage.com ads posted under phone numbers belonging to **SABAR**, **GLAZE** and

MCKNEELY. I further observed that this particular Backpage.com ad was placed under the email account kellybanks5959@gmail.com which has been identified as belonging to **GLAZE** and **MCKNEELY**.

CONCLUSION

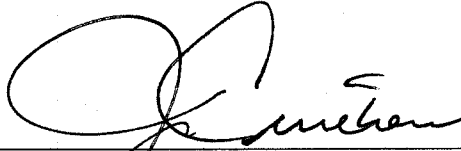
32. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning on or about November 18, 2016, and continuing through on or about February 1, 2018, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendants, **SABAR** (also known as Brian Pimental), **GLAZE**, and **MCKNEELY**, along with others known and unknown, conspired and agreed with each other to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained the following individuals, as well as others, AV1 and AV2, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion, and any combination of such means would be used to cause AV1 and AV2 to engage in commercial sex acts, in violation of 18 U.S.C. §§ 1591(a)(1) and (a)(2) and (b)(1).

In violation of 18 U.S.C. § 1594(c) (18 U.S.C. §§ 1591(a)(1) and (a)(2) and (b)(1)).



Michael C. Pederson
Special Agent
Department of Homeland Security
Homeland Security Investigations

Subscribed and sworn before me this 17th day of December 2018 at 3:01 pm hours in Fort Worth, Texas.



JEFFREY CURETON
United States Magistrate Judge